

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Centurion Container LLC
15555 La Salle Street
South Holland, Illinois 60473

ATTENTION:

Kay Robinson
Corporate Safety, Health, Environmental & Quality (SHEQ) Director
kayr@c-containers.com

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Centurion Container LLC (“Centurion” or “you”) to submit certain information about the facility at 15555 La Salle Street, South Holland, Illinois. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Centurion owns and operates an emission source at the South Holland, Illinois facility. We are requesting this information to determine whether you are complying with the Illinois State Implementation Plan (SIP) requirements.

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. If possible, we ask Centurion to upload all required information to the secured web-link shared

with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Sasha Letuchy at Letuchy.alexandra@epa.gov or 312-886-6035] to make arrangements to submit your response.

Centurion must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

Failure to comply fully with this information request may subject Centurion to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Sasha Letuchy at
312- 886-6035.

Michael D. Harris
Division Director
Enforcement and Compliance Assurance
Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measurement of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or 35 Ill Adm. Code Part 211.

Appendix B

Information You Are Required to Submit to EPA

Centurion must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) for its operations at 15555 La Salle Street, South Holland, Illinois 60473 (the Facility).

For Requests 1 to 10, provide the information within 45 calendar days from receipt of this letter. These requests cover the time period from January 1, 2018 to the date you receive this request. Request 11 has separate deadlines that are set forth in paragraphs a-d, below:

1. Provide a schematic diagram of the Facility, depicting the overall wash processes and reuse of wash water.
2. Provide a detailed narrative description of the processes employed at the Facility to refurbish or recycle industrial bulk containers (IBC) and describe each piece of process equipment/emission unit.
3. Provide a Process and Instrumentation Diagram for fresh water, recycled water, all associated tanks and water circulation system, and description of the re-use of wash water/caustic between the various wash steps, which indicate where recycling occurs, where water storage occurs, and where fresh water is added, etc., and all water sampling data for the wash water.
4. For the IBC refurbishing and recycling operation(s) at the Facility, provide the installation date, and a date and detailed narrative description of any modification(s) to the process equipment.
5. Provide the hours of operation of each emission unit on a monthly basis, throughput on a monthly basis, and the hourly rate of IBC processed through each emission unit on a monthly basis.
6. Provide the maximum capacity (hourly rate) of IBC processed through each emission unit.
7. Provide all documents related to the materials in the IBCs received by the Facility,
 - a. In an electronic, unlocked spreadsheet, provide the following for each IBC: date of receipt, date of processing, material formerly contained (if known), whether the material is a hazardous material, whether the material is or contains a VOM/VOC, and whether the material is photochemically reactive¹;

¹ As defined in Section 211.4690 (photochemically reactive material) and Section 211.7150 (VOM/VOC) of 35 Ill Adm. Code Part 211.

- b. In an electronic, unlocked spreadsheet, provide on a daily and monthly basis (using the information from Request 7.a):
 - i. the percentage of IBCs received/processed that formerly contained hazardous material;
 - ii. the percentage of IBCs received/processed that formerly contained an unknown nonhazardous material;
 - iii. the percentage of IBCs received/processed that formerly contained VOMs/VOCs; and,
 - iv. the percentage of IBCs received/processed that formerly contained a photochemically reactive material¹, using the information from Request 7.a.;
 - c. All supporting documents related to the materials in the IBCs received by the Facility, including, but not limited to:
 - i. Bills of Lading;
 - ii. Resource Conservation Recovery Act (RCRA) empty container certifications;
 - iii. Hazardous waste manifests;
 - iv. Technical data sheets;
 - v. Material Safety Data Sheets; and
 - vi. Analytical data on the materials.
8. Provide copies of all air quality permits issued by the Illinois Environmental Protection Agency (IEPA) to the Facility, including, but not limited to, Title V Permits, Permits to Install or Construction Permits, Permits to Operate, ROSS Permits, and Lifetime Operating Permits.
9. Provide copies of all air permit applications submitted to IEPA, including, but not limited to, Title V Permits, Permits to Install or Construction Permits, Permits to Operate, ROSS Permits, and Lifetime Operating Permits.
10. Provide a detailed description of the type and amount of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) emitted by the Facility, in pounds per hour and tons per year. Submit your response with supporting information including but not limited to air emissions calculations and annual emissions reports.
11. Submit an emission test protocol, conduct emission testing, and submit all other information requested within the schedules provided below for the Facility.
- a. Within 30 days of receipt of this request, submit to EPA for approval an emission test protocol to measure photochemically reactive VOM/VOC emissions (lbs/hr)¹ from the washing operation, which consists of: pre-flush, wash, power wash, and fresh water rinser. This performance testing must be conducted using a

combination of the following EPA Reference Methods: Methods 1 through 4, Method 25A (40 C.F.R. Part 60, Appendix A), and Method 204 (40 C.F.R. Part 51, Appendix M). The protocol shall specify the following:

- i. A temporary total enclosure (“TTE”) shall be constructed to enclose the four steps. The TTE must be verified and evaluated against the criteria of Method 204.
- ii. Three sampling runs will be conducted. Each sampling run shall be at least one hour long.
- iii. Testing will be conducted at a production rate and operating conditions that are consistent with representative (normal) conditions as described in EPA Stack Testing Guidance².
 1. Identify the maximum capacity of each emission unit and the production rate you plan to achieve during the test. Provide a description of how those conditions are consistent with the Clean Air Act National Stack Testing Guidance. If you do not plan to operate at the maximum capacity, provide an explanation as to why the expected capacity meets the testing conditions described in EPA Stack Testing Guidance;
 2. Provide a list of IBCs that will be processed during the testing, including a description of the materials formerly contained in the IBCs. The IBCs must be selected based on the materials formerly contained in the IBCs. The IBCs must have exclusively contained materials that meet both the definition of VOMs/VOCs and photochemically reactive material to ensure the IBCs being processed during the testing are reflective of conditions that are likely to most challenge the Facility with regard to meeting applicable emission standards.
 3. Describe parametric and operating ranges for processes and how they will be operating during the test. Provide a description of how those conditions are consistent with the Clean Air Act National Stack Testing Guidance;
 4. Provide information on the expected water temperature, water pH, and status of wash water during the stack test, and a description of how those conditions are consistent with the Clean Air Act National Stack Testing Guidance.

² Tests should be performed under conditions that represent the range of combined process and control measure conditions under which the facility expects to operate (regardless of the frequency of the conditions); and, that are likely to most challenge the emissions control measures of the facility with regard to meeting the applicable emission standards, but without creating an unsafe condition. Clean Air Act National Stack Testing Guidance, § VII.5 (April 27, 2009), available at https://www.epa.gov/sites/default/files/2013-09/documents/stacktesting_1.pdf.

For status of wash water, include a description of how often fresh water is added and how/when this addition will be done prior to the stack test, to ensure that testing is consistent with the Clean Air Act National Stack Testing Guidance;

- iv. Explain how IBC staging will occur;
 - v. Identify the proposed total number of IBCs planned to be processed per run as well as capacity for each step;
 - vi. Specify the calibration gases that will be used for Method 25A, including a justification for the selection;
 - vii. Specify methods for addressing moisture in the exhaust stream; and
 - viii. Specify information that will be submitted in the Performance Test Report as detailed below.
- b. Within 65 days of your receipt of this request, complete the emission tests in accordance with the approved testing protocols submitted per Request 11.a. In advance of the tests, Centurion must obtain approval from EPA on the testing and make any adjustments to the protocols required by EPA.
- c. At least 15 days prior to the planned emission test(s) under this request, submit notification to EPA via email (letuchy.alexandra@epa.gov and R5airenforcement@epa.gov) and to IEPA of the intent to perform emission testing.
- d. Within 30 days after completion of the emission tests, submit a complete report of the emission test(s), including the following, at a minimum:
- i. Summary of Results
 - 1. Results of the above specified emission tests for photochemically reactive VOM/VOC;
 - 2. Discussion of response factors, molecular weight corrections; or any other factors used to convert raw data into the reported results;
 - 3. Results of the TTE evaluations;
 - 4. Discussion of any test errors;
 - 5. Discussion of any deviations from the reference test methods. Any planned deviations should be included in the protocol and approved prior to the testing.
 - ii. Facility Operations
 - 1. Description of the operation process;

2. Operating parameters of the process at the time of each test, including but not limited to: line speed for each emission unit (IBCs/hour per run), amount of material in the IBC, the material formerly contained in each IBC;
3. Facility operating parameters that demonstrate that the facility was being operated at representative (normal) conditions, including, items in 11.a.iii. above.

iii. Sampling and Analytical Procedures

1. Sampling port location(s) and dimensions of cross-sections;
2. Cyclonic flow results
3. Sampling point description, including labeling system;
4. Brief description of sampling procedures, including equipment and any diagrams;
5. Description of sampling procedures (planned and accidental) that deviated from any standard methods;
6. Brief description of analytical procedures, including calibration;
7. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
8. Quality control/quality assurance procedures, tests, and results.

iv. Appendix

1. Complete results with example calculations;
2. Calculations for converting raw data into the reported results;
3. Copies of notes or forms documenting raw field data (if collected in non-digital format);
4. Laboratory report, with signed chain-of-custody forms;
5. Calibration procedures and results;
6. Raw process and equipment data, signed by plant representative;
7. Test log(s);
8. Photo log of each IBC's label identifying the constituents of each drum and verifying that it meets the definition of both VOM/VOC and photochemically reactive material;
9. Project participants and titles; and
10. Related correspondence.